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January 29, 2021

VIA ECF

Hon. Ronnie Abrams, U.S.D.J.
United States District Court for the Southern
District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 1506
New York, NY 10007

Re: '94 Sounds LLC v. Jamir Rucks and Alamo Records LLC, 20-cv-08367

Dear Judge Abrams:

We represent Defendants Jamir Rucks and Alamo Records LLC (“Defendants”) in connection with the above-referenced action. In accordance with Rule 1.D of your Honor’s Individual Rules, we write, with the consent of Plaintiff ’94 Sounds LLC’s (“Plaintiff”) counsel, to respectfully request an extension of certain deadlines in connection with Plaintiff’s Amended Complaint filed on January 26, 2021 (ECF Doc. No. 29).

Rule 4.C of Your Honor’s Individual Rules, requires Defendants within 14 days from the filing of the amended pleading, *i.e.*, February 9, 2021, to either file an answer, file a new motion to dismiss, or advise the Court that they are relying on their previously filed motion to dismiss. However, as contemplated in Plaintiff’s December 23, 2020 letter, which was so-ordered by this Court on December 28, 2020 (ECF Doc. No. 26), upon filing of an Amended Complaint by Plaintiff, the parties were to meet and confer on a revised briefing schedule in the event Defendants elected to file a new motion to dismiss the amended pleading. *Id.*

On January 28, 2021, the parties’ counsel met and conferred regarding the briefing schedule for Defendants’ new motion to dismiss and have agreed to the following briefing schedule:

- Defendants’ Moving Papers due on or before February 26, 2021
- Plaintiff’s Opposition due on or before March 30, 2021
- Defendants’ Reply due on or before April 16, 2021



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No prior request for the extensions sought herein have been made. The extensions requested herein do not affect any of the scheduled dates set forth in the Court's Case Management Plan and Scheduling Order. (ECF Doc. No. 20).

We thank the Court for its time and consideration, and should Your Honor need any further information or if the Court would like to discuss any of the above, we are available at the Court's convenience.

Respectfully Submitted,

s/ Mona Simonian

Mona Simonian

cc: Counsel of Record (via ECF)

Application granted.

SO ORDERED.



Hon. Ronnie Abrams
February 1, 2021